

**UNITES STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

X

Nabi Rasul

Plaintiffs

**No. 12-cv-4477
(LDW)(AKT)**

-against-

**Worldwide Asset Purchasing II,
LLC, Cohen & Slamowitz, LLP**

Defendants

X

The Plaintiff and Defendants propose the following Case Management and Scheduling Order:

1. DEADLINES AND COURT APPEARANCES:

Deadline for completion of initial disclosures	December 7, 2012
First Request for production of documents and first request for interrogatories due by	January 11, 2013
Response to first request for production of document and first request for interrogatories due by:	February 25, 2013
Deadline for for Joinder of Additional Parties and Amendment of Pleadings:	March 8, 2013
Status conference	April 26, 2013 at 2:00pm
All discovery, including production of all expert reports, if any, to be completed by	August 2, 2013
Dispositive motion process started	August 16, 2013
Joint Pretrial order due by	August 30, 2013

Pretrial conference

September ___, 2013
at ___ pm

Additional Agreements:

A. So as to avoid the unnecessary time of retyping discovery requests, the parties agree to provide each other, via electronic means (i.e. email), discovery requests in word processor format (Word, Word Perfect, etc).

/s/ Brian L. Bromberg

Brian L. Bromberg

Michael N. Litrownik

Bromberg Law Office, P.C.

Attorneys for Plaintiff

40 Exchange Place, Suite 2010

New York, NY 10005

Tel: (212) 248-7906

November 27, 2012

Date

/s/ Wendy B. Shepps

Wendy B. Shepps

Podvey, Meanor, Catenacci, Hildner,

Cocoziello & Chattman, P.C.

Attorneys for Defendant Cohen & Slamowitz, LLP

570 Lexington Avenue, Suite 1600

New York, New York 10022

Telephone: (212) 432-7419

November 27, 2012

Date

Defendant Worldwide Asset Purchasing II, LLC has neither appeared nor responded to correspondence from Plaintiff's counsel requesting that it appear.